



NATIONAL STRIKE FORCE (NSF) GUIDANCE ON CERCLA RESPONSES WHEN SUPPORTING EPA OSCS

The NSF, when called upon as a special force to assist an EPA OSC on a CERCLA case, operates using reimbursable funding authorized by the EPA's OSC and their respective Region, provided to the Coast Guard in an Inter-Agency Agreement (IAG) negotiated between the EPA Region and the NPFC. These IAGs may be either incident specific or "blanket" for a set period of time, usually one year.

Funding procedures

Strike Teams or PIAT, upon receipt of an EPA OSC request and after determining that the strike team will respond, are authorized to issue a locally generated CERCLA Project Number (CPN) and associated ceiling. The Strike Team will promptly advise NPFC via the Strike Team Launch Message that the CPN has been issued and the amount of ceiling the EPA FOSC has authorized. If the Strike Team must obligate funds in advance of the launch message being sent, the Strike Team will notify the NPFC by message and request activation of the CPN in the Coast Guard accounting system.

NPFC(cf), upon receipt of a strike team request, will promptly verify the availability of funds. If funds are not available, the NPFC will immediately initiate negotiations with the respective EPA Region to ensure funds are made available. However, the Strike Team is authorized to continue the response while those negotiations proceed, unless the NPFC specifically directs the Strike Team that funds are not available and the CG actions in support of the EPA FOSC must be paid for in some other way.

Financial procedures

Strike teams shall not request CPNs and ceilings from the NPFC when they are supporting a CG OSC on a CERCLA response. They shall seek funding from the respective CG OSC, and use the CERCLA accounting string assigned to the CG OSC by the NPFC.

Response documentation and financial close-out

Strike Teams/PIAT shall use LUFs to record appropriate obligations and expenditures when using CERCLA reimbursable funds on a response. Strike Teams/ PIAT shall follow the NPFC Resource Documentation TOPs in documenting the daily cost of CG personnel, equipment, and other CG provided services (e.g.: MSL) used during a response. If the EPA OSC is using EPA's RCMS system and recording these costs in RCMS, then RCMS printouts, signed by the EPA OSC, are acceptable alternative documentation. Strike Teams shall retain supporting documentation for a period of 10 years from the conclusion of the response.



Chapter 3: Removal Actions: Oil and Hazardous Substances

Strike Teams/PIAT shall document obligations and resulting expenditures using LUFs. NFPC(cf) will provide Unbilled Expenditure Reports to allow the strike team to compare local records against official DAFIS records. Once the Strike Team has corrected all discrepancies, including submitting PES error reports when necessary, the Strike Team may endorse Unbilled Expenditure Reports and return it to NFPC(cf). This will serve as adequate documentation of all spending under the respective CPN. Strike Teams shall retain supporting documentation (purchase orders, travel claims, etc.) for a period of 10 years from the conclusion of the response.

When the response has concluded, or when extended operations last more than 6 months, the Coast Guard will bill EPA under the IAG for the costs incurred to date. The NPFC is responsible for compiling the bill and directing FINCEN to bill EPA. The Strike Team is responsible for providing NPFC the cost information supporting the bill.

For an interim bill, the NPFC will coordinate with the respective strike team a timetable for the strike team to submit cost documentation to the NPFC.

Within 90 days of the conclusion of any Strike Team support to an EPA OSC under CERCLA, the strike team shall provide a cost summary report to the NPFC for the response. The cost summary report shall have the format as specified in the NPFC Resource Documentation TOPs.